

1 December 2012

To whom it may concern,

In relation to the NPRM, FCC 12-121, which covers the WT Docket No. 12-283, RM-11629, RM-11625, WT Docket No. 09-209; I have the following comments.

In relation to Giving Examination Credit a perpetual life, I strongly discourage that you take that action.

FCC rules changes with time. Some technical aspects of amateur radio can also change and evolve with time. It is supposed that if you keep your Amateur Radio License active, that you keep up date with changes. If you let your license expire you may not keep up with the changes. The retaking of the test makes sure that the person has studied and kept up with changes.

In relation to reducing the Grace Period of renewal from 2 years to 180 days, I also strongly discourage that you change it.

There are many valid reasons for a amateur radio license owner let the license expire (on purpose or by omission). An example of this might be service members of the armed forces deployed overseas. Giving only 180 days to renew a license will negative affect this persons, specially by loosing their call signs. Call signs sometimes can be viewed as part of the identity of the person. Having to use a vanity call sign to get an old call sign because it expired will bring extra paperwork to the FCC, and extra cost to the person. Two (2) years is a fair amount of time to give this persons time to be able renew the license without loosing their call sign and adding extra paperwork to the FCC (and cost to the owner, due to having to get a vanity call sign to get old call sign).

In the matter of reducing the number of VE from three (3) to two (2) I must also strongly advice that you do not change that.

Having less people in charge of a test session makes easier for fraud. It is harder for three (3) persons to get along to commit fraud, than it is to get two (2). I understand that it is not impossible to prevent fraud, just make it harder. We have already had some hard times with fraud and amateur license sales in the past, for make it easier now for criminals to do their crime.

In the matter of remote testing, that I have a mixed feeling, so I would advice for the moment to not change that and allow remote testing now, but do study and analyze for a future time.

As an university professor certified in Distance Education in various modes (TV, Online, Etc.) I am not against the use of technologies and tools that allow for the provision of remote teaching and testing. But I do also recognize that our amateur culture is still not ready for remote testing. Doing remote testing with good quality and controls to minimize test fraud is not just say lets do it and put some technology help (like a camera and TV) and just give the test. One must have very sound protocols and procedures. One must determine if all examiners must may be remote or if at least one examiner must be present. One must determine ways to determine if the test answers are actually the students answers or other person answers. And many other details. Right now amateur radio culture and VE infrastructure is not ready for that, and on the short time they can not prepare successfully for that kind of change. I do understand that it is something that may be good in the future, and is something that must be thought and analyzed again in the future, when amateur radio is ready for it.

For adding new emission types, I have nothing about it, as long as the actual emission types do not get affected or eliminated.

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